

Community Development Financial Institutions Fund, Department of the Treasury

Supporting Statement – Part A

Office of Certification, Compliance Monitoring and Evaluation Title VI Compliance Worksheet
OMB Control Number 1559-XXXX

A. Justification

1. Circumstances necessitating collection of information

The Community Development Financial Institutions Fund (CDFI Fund), Office of Certification, Compliance Monitoring and Evaluation (CCME) Title VI Compliance Worksheet (Worksheet) will capture qualitative information from all Applicants to the CDFI Fund's Federal Financial Assistance Programs. The Worksheet will be submitted once annually from all Applicants to assess their compliance with federal civil rights requirements via an online form through the CDFI Fund's Awards Management Information System (AMIS). Applicants must be compliant with federal civil rights requirements in order to be deemed eligible to receive Federal Financial Assistance grants from the CDFI Fund. The questions in the Worksheet are intended to assist the CDFI Fund in determining whether Federal Financial Assistance Applicants are compliant with the Treasury regulations implementing Title VI of the Civil Rights Act (Title VI), set forth in 31 CFR Part 22. These requirements are set forth in the United States Department of the Treasury regulations implementing Title VI located in 31 CFR Part 22, Nondiscrimination on the Basis of Race, Color, or National Origin in Programs or Activities Receiving Federal Financial Assistance from the Department of the Treasury. These regulations apply to Applicants as well as their prospective sub-recipients that are not direct beneficiaries of Federal Financial Assistance (e.g., Depository Institution Holding Company and their Subsidiary Depository Institutions).

2. Method of collection and use of data

The CDFI Fund collects data on an annual basis from all Applicants. The Worksheet will be submitted once annually from all Applicants to assess their compliance with federal civil rights requirements.

3. Use of Information Technology

The Worksheet will be an online form submitted through AMIS.

4. Efforts to identify duplication

The CDFI Fund will ensure no similar data is gathered or maintained by the CDFI Fund or are available from other sources known to the CDFI Fund. All of the information requested is required in order to assess an Applicant's compliance with federal civil rights requirements.

5. Impact on small entities

Small business or other small entities may be involved in these efforts; however, this collection of information is not expected to have a significant impact on small entities because the data needed to complete the Worksheet should already be incorporated into the Applicant's policies and procedures.

6. Consequences of less frequent collection and obstacles to burden reduction

The CDFI Fund cannot assess an Applicant's compliance with federal civil rights requirements without the annual submission of this Worksheet.

7. Circumstances requiring special information collection

There are no special circumstances.

8. Consultation with Persons outside the Agency

Pursuant to the notice and request for comments published in the Federal Register on March 31, 2021 (86 FR 16835) the CDFI Fund received (1) comment from one (1) organization on the Worksheet. The public comment received asked for confirmation that the Worksheet was not applicable to New Markets Tax Credit Program Allocatee(s).

9. Provision of payment to respondents

No payments or gifts will be made to respondents.

10. Assurance of confidentiality

The CDFI Fund is subject to all federal regulations with respect to confidentiality of information supplied in the Worksheet. All information collected in the Worksheet is submitted through AMIS. Access to AMIS to submit an organization's Worksheet is restricted to Applicants, and their designated representatives, through an authenticated and secure organizational profile. Access to data submitted in response to the Worksheet will be limited to CDFI Fund staff and, if applicable, designated contractors who are subject to all federal regulations and have completed annual privacy and cybersecurity training.

11. Justification of sensitive questions.

No questions of a sensitive nature will be asked through this Worksheet. No personally identifiable information will be collected.

12. Estimate of the hour burden of information collection.

Estimated Annual Reporting Burden				
Type of Collection	Number of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Worksheet	900	1	.5	450

13. Estimate of total annual cost burden to respondents

There are no additional capital, start-up or ongoing operational, or maintenance costs associated with information collection.

14. Estimate of annualized cost to the Government

The cost to the Government is the CDFI Fund staff time required to develop the Worksheet, review submitted Worksheets, and report the results. The estimate of annualized cost to the Federal government is based on a methodology that estimated the time and loaded labor rate for the CDFI Fund staff by GS level for the lifecycle of the collection. The estimated total cost is \$18,221.

Specifically, the CDFI Fund estimated a GS-13 staff member would spend 15 minutes reviewing 900 Worksheet responses. The GS-13 staff wage rate was then multiplied by 1.63 to capture the value of non-wage compensation (900 responses x 15 minutes x \$80.98/hour (\$49.68 x 1.63). The average fully loaded cost per hour was based on a standard 2,000 full time equivalent (FTE) hours per year.

15. Any program changes or adjustments

This submission is a new request for approval.

16. Plans for information tabulation and publication

Although the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitations of the qualitative results discussed above.

17. Reasons for not displaying expiration date of OMB approval

The expiration date will be displayed.

18. Explanation of exceptions to certification statement

There are no exceptions to the certification statement.